



*State of New Jersey*

OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
PO BOX 080  
TRENTON, NJ 08625-0080

MATTHEW J. PLATKIN  
*Attorney General*

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

January 23, 2023

The Honorable Renée Marie Bumb, U.S.D.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101

Re: *Siegel v. Platkin*, 22-cv-7463  
*Koons v. Reynolds*, 22-cv-7464

Dear Judge Bumb,

I represent the State Defendants in the above-captioned consolidated matters. On January 12, 2023, the *Koons* parties informed this Court that the parties would like to have an opportunity to confer on a preliminary injunction schedule in light of the grant of consolidation of the *Koons* and *Siegel* matters. Since that time, this Court has scheduled a hearing on the *Siegel* TRO on January 26, 2023. In the interest of setting an expedient schedule on the pending motions for preliminary injunction in both cases, the State submits this letter to propose a scheduling order.

As this Court is aware, the *Koons* Plaintiffs challenge five provisions of the sensitive places law in P.L. 2022 Chapter 131 Section 7, and seek both a TRO and PI on their challenges. This Court granted a TRO on the *Koons* Plaintiffs' claims on January 9, 2023.

In their pending TRO application, the *Siegel* Plaintiffs challenge the same five provisions as the *Koons* Plaintiffs, plus additional provisions of Chapter 131 Section 7's sensitive places law. Moreover, the *Siegel* Plaintiffs also challenge other, non-place-based provisions of Chapter 131, but did not seek TRO relief on those provisions. *See*



*Siegel v. Platkin*, 22-cv-7463 D.E. 8-10 (Dec. 23, 2022) (non-TRO relief listed on pages 3-4 as items (s) through (aa), comprising of challenges to Chapter 131's Sections 2, 3, 4, 5, and 8).

To maximize the benefits of consolidated proceedings, State Defendants believe it would be most efficient to resolve both *Koons* and *Siegel* Plaintiffs' PI challenges to Sections 7—all of which deal with place-based restrictions on the carrying of firearms—together. This Court will have already reviewed the TRO submissions on those challenges, and expeditious resolution of the PI application can follow. As for the additional provisions that only the *Siegel* Plaintiffs challenge—which do not involve place-based restrictions and were not deemed sufficiently emergency in nature for a TRO application in Plaintiffs' view, the State proposes a still-expeditious schedule that would follow shortly after hearing on the place-based PI challenges. The Court can issue its decision on the place-based PI challenges even as the *Siegel* parties brief the remaining PI issues.

Thus, State Defendants propose the following PI schedule for the consolidated cases:

- **February 6, 2023:** Defendants submit consolidated PI opposition on both *Koons* and *Siegel* challenges to P.L. 2022 Chapter 131, Section 7.<sup>1</sup>
- **February 13, 2023:** *Koons* and *Siegel* Plaintiffs submit replies in support of their respective PI motions.
- **Week of February 13, 2023:** PI Hearing on consolidated challenges to P.L. 2022 Chapter 131, Section 7.
- **February 27, 2023:** Defendants submit PI opposition to *Siegel* challenges to other portions of Chapter 131.
- **March 8, 2023:** *Siegel* Plaintiffs submit PI reply on challenges to other portions of Chapter 131.
- **Week of March 13 or March 20, 2023:** PI hearing on *Siegel* challenges to other portions of Chapter 131.

---

<sup>1</sup> Should this Court issue a TRO decision in *Siegel* after February 1, 2023, the State Defendants may require a modest extension to submit their consolidated PI response.

State Defendants have sought Plaintiffs' consent to the above schedule. The *Koons* Plaintiffs objected to a consolidated PI briefing schedule on the place-based challenges, but did not object to bifurcating the non-place-based PI challenges. The *Siegel* Plaintiffs did not object to a consolidated PI briefing schedule, but did object to bifurcating the non-place-based PI challenges.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Angela Cai  
Angela Cai  
Deputy Solicitor General

cc: Daniel L. Schmutter, Esq.  
David Jensen, Esq.